

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

IN RE GENWORTH FINANCIAL, INC.,
SECURITIES LITIGATION

Civ. A. No. 3:14-cv-00682-JAG

Hon. John A. Gibney, Jr.

CLASS ACTION

**LEAD PLAINTIFFS' MEMORANDUM IN SUPPORT OF THEIR MOTION TO SEAL
REPLY MEMORANDUM OF LAW AND EXHIBITS IN FURTHER SUPPORT OF
THEIR MOTION TO COMPEL PRODUCTION OF DOCUMENTS AND OPPOSING
DEFENDANTS' REQUEST TO "CLAWBACK" NON-PRIVILEGED DOCUMENTS**

Lead Plaintiffs Fresno County Employees' Retirement Association and Her Majesty the Queen in Right of Alberta ("Lead Plaintiffs"), by and through their undersigned counsel of record, respectfully submit this Memorandum in support of their Motion To Seal Reply Memorandum Of Law And Exhibits in support of their Motion To Compel Production Of Documents And Opposing Defendants' Request To "Clawback" Non-Privileged Documents ("Motion to Seal").

The Parties to this action entered into a Stipulated Protective Order filed with this Court on June 25, 2015 (the "Protective Order") (ECF No. 85). Section 5.2 of the Protective Order requires a party to file under seal materials containing information designated by another party as Confidential Discovery Material (as defined in the Protective Order). Here, Defendants have made this designation as to the documents and information set forth in Lead Plaintiffs' Reply Memorandum of Law and Exhibits supporting their Motion To Compel Production Of Documents And Opposing Defendants' Request To "Clawback" Non-Privileged Documents.

Under these circumstances, Section 5.2 of the Protective Order requires that these materials be filed under seal as an initial matter.

DATED: November 19, 2015

/s/ Susan R. Podolsky
Susan R. Podolsky (Va. Bar No. 27891)
LAW OFFICES OF SUSAN R. PODOLSKY
1800 Diagonal Road, Suite 600
Alexandria, Virginia 22314
Telephone: (571) 366-1702
Facsimile: (703) 647-6009
spodolsky@podolskylaw.com

*Local Counsel for Lead Plaintiffs Her Majesty
the Queen in Right of Alberta and Fresno
County Employees' Retirement Association*

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

David R. Stickney (admitted *pro hac vice*)
Jonathan D. Uslander (admitted *pro hac vice*)
Brandon Marsh (admitted *pro hac vice*)
12481 High Bluff Drive, Suite 300
San Diego, California 92130
Telephone: (858) 793-0070
Facsimile: (858) 793-0323
davids@blbglaw.com
jonathanu@blbglaw.com
brandon.marsh@blbglaw.com

*Counsel for Lead Plaintiff Fresno County
Employees' Retirement Association and
Co-Lead Counsel for the Class*

**BLEICHMAR FONTI
TOUNTAS & AULD LLP**

Joseph Fonti (admitted *pro hac vice*)
Javier Bleichmar (admitted *pro hac vice*)
Wilson Meeks (admitted *pro hac vice*)
7 Times Square, 27th Floor
New York, New York 10036
Telephone: (212) 789-1340
Facsimile: (212) 205-3960
jfonti@bftalaw.com
jbleichmar@bftalaw.com
wmeeks@bftalaw.com

*Counsel for Lead Plaintiff Her Majesty the
Queen in Right of Alberta and Co-Lead
Counsel for the Class*

CERTIFICATE OF SERVICE

I hereby certify that on November 19, 2015, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

/s/ Susan R. Podolsky
Susan R. Podolsky
Virginia Bar No. 27891
1800 Diagonal Road
Suite 600
Alexandria, VA 22314
Phone: 571-366-1702
Fax: 703-647-6009
spodolsky@podolskylaw.com

Local Counsel for Lead Plaintiffs